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Counsel for Defendants
UBER TECHNOLOGIES, INC. and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MARTHA L.
GOODMAN IN SUPPORT OF
DEFENDANTS UBER
TECHNOLOGIES, INC.'S AND
OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL THEIR OPPOSITION
TO WAYMO MOTION TO COMPEL
FURTHER 30(b)(6) TESTIMONY**

Judge: Hon. Jacqueline Scott Corley
Trial Date: October 10, 2017

1 I, Martha L. Goodman, declare as follows:

2 1. I am an attorney with the law firm of Boies Schiller Flexner LLP representing
3 Defendants Uber Technologies Inc. and Ottomotto LLC (collectively, “Uber”) in this matter. I
4 make this declaration based upon matters within my own personal knowledge and if called as a
5 witness, I could and would competently testify to the matters set forth herein. I make this
6 declaration in support of Uber’s Administrative Motion To File Under Seal Their Opposition To
7 Waymo’s Motion To Compel Further 30(B)(6) Testimony (“Opposition Letter Brief”).

8 2. I have reviewed the following exhibits and only the portions identified below merit
9 sealing:

Document	Portions to Be Filed Under Seal	Designating Party
Opposition Letter Brief	Highlighted Portions	Defendants
Exhibit 2	Highlighted Portions	Defendants
Exhibit 3	Highlighted Portions	Defendants

13 3. The blue-highlighted portions the Opposition Brief, and the red, blue, and yellow-
14 highlighted portions of Exhibits 2 and 3 contain confidential and highly confidential information
15 regarding Uber’s LiDAR development and autonomous vehicle business strategy and plans. This
16 information is not publicly known and its confidentiality is strictly maintained. Disclosure of this
17 information could allow competitors to obtain a competitive advantage over Uber by giving them
18 details into Uber’s internal development of LiDAR and autonomous vehicles, which would allow
19 competitors to understand Uber’s LiDAR development and autonomous vehicles business strategy,
20 and allow them to tailor their own strategy. If such information were made public, Uber’s competitive
21 standing could be significantly harmed.

22 4. The highlighted portions of Exhibits 2 and 3 also contain Uber employee names, the
23 disclosure of which would threaten the privacy of individuals at a company that is currently the
24 subject of extensive media coverage.

25 3. Uber’s request to seal is narrowly tailored to the portions of the Opposition Letter
26 Brief and its supporting papers merit sealing.
27
28

1 I declare under penalty of perjury that the foregoing is true and correct. Executed this
2 26th day of August, 2017 at Washington, D.C.

3
4 Dated: August 26, 2017

BOIES SCHILLER FLEXNER LLP

5 By: /s/ Martha L. Goodman
6 Martha L. Goodman
7
8

9 **ATTESTATION OF E-FILED SIGNATURE**

10 I, Karen L. Dunn, am the ECF User whose ID and password are being used to file this
11 document. In compliance with General Order 45, X.B., I hereby attest that Martha L. Goodman
12 has concurred in this filing.

13 Dated: August 26, 2017

14 /s/ Karen L. Dunn
15 Karen L. Dunn
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